

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY MUTUAL INSURANCE COMPANY

Plaintiff,

V.

COUNTY OF DELAWARE, PENNSYLVANIA,
COUNTY COUNCIL OF THE COUNTY OF
DELAWARE, PENNSYLVANIA, and
DELAWARE COUNTY DEPARTMENT OF
PUBLIC WORKS.

Defendants.

CIVIL ACTION NO. 02-CV-2883

JURY TRIAL DEMANDED

ANSWER TO COUNTERCLAIM

Plaintiff Liberty Mutual Insurance Company ("Liberty"), by and through its undersigned counsel, Bazelon Less & Feldman, P.C., hereby files its Answer to Counterclaim, and in support thereof, avers as follows:

72. After reasonable investigation, Plaintiff Liberty Mutual Insurance Company is without sufficient knowledge or information to form a belief as to the truth of the allegations of Defendants' paragraph 72; therefore the same are denied pursuant to Rule of Court.

WHEREFORE, Plaintiff Liberty Mutual Insurance Company hereby demands judgment in its favor and against the County of Delaware, Pennsylvania, the County Council of the County

of Delaware, Pennsylvania, and the Delaware County of Public Works in the amount of \$196,410.95, plus interest and such further relief as the Court deems necessary.

BAZELON LESS & FELDMAN

Jennifer L. Hoagland
Attorney I.D. No. 57256
Greg A. Rowe
Attorney I.D. No. 80066
1515 Market Street, Suite 700
Philadelphia, PA 19102-1907
(215) 568-1155
Attorneys for Plaintiff

August 13, 2002

J:\Liberty Bond & Mutual, 3536\Fair Acres, 00011\Pleading\Answer to Counterclaim.wpd